

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:) CHAPTER 7
)
BAM TECH SOLUTIONS, INC.) CASE NO: 23-53167
)
Debtor.)
)

**SECOND MOTION FOR EXTENSION OF TIME FOR FILING
SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

Bam Tech Solutions, Inc, (the “**Debtor**”) files this second Motion for Extension of Time for Filing Schedules and Statement of Financial Affairs (the “**Motion**”) and in support thereof, respectfully represents:

1. Debtor filed its petition for relief under Chapter 7, Title 11, of the United States Code on April 3, 2023 (the “**Petition Date**”).
2. Pursuant to 11 U.S.C. § 521 and Fed. R. Bankr. P. 1007(c), the debtor is obligated to file its Schedules and Statement of Financial Affairs within fourteen days of the Petition Date. The deadline expires on April 17, 2023.
3. On April 19, 2023, the Court entered an Order [Doc 8] granting Debtor’s first motion [Doc 6] to extend time to file schedules through and including May 1, 2023.
4. The Debtor requests an additional extension of 4 days through and including May 5, 2023, within which to file its Schedules and Statement of Financial Affairs. The additional time will provide the Debtor with an opportunity to thoroughly prepare the Statement of Financial Affairs and will result in an accurate reporting of the information required to be disclosed therein.

5. This is Debtor's second request for an extension, and Debtor believes that additional extensions will not be required. The § 341 Meeting of Creditors has been scheduled for May 9, 2023. WHEREFORE, the Debtor respectfully requests this Court:

- (a) enter an order, substantially in the form attached hereto as **Exhibit A**;
- (b) grant the requested extension through and including May 5, 2023; and
- (c) grant such other and further relief as the Court deems just and reasonable.

Dated: May 1, 2023

ROUNTREE LEITMAN KLEIN & GEER, LLC

/s/ Will Geer
Will Geer, GA Bar No. 940493
2987 Clairmont Road, Suite 350
Atlanta, GA 30329
Tel. 404-584-1238
wgeer@rlkglaw.com
Attorneys for Debtor

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:) CHAPTER 7
)
BAM TECH SOLUTIONS, INC.)
) CASE NO: 23-53167
)
Debtor.)
)

CERTIFICATE OF SERVICE

This is to certify that I have this day caused to be served copy of the foregoing **Second Motion for Extension of Time for Filing Schedules and Statement of Financial Affairs** via by filing same with the court using the CM/ECF system, which will send an electronic mail notification to the parties as indicated below:

- **S. Gregory Hays** ghays@haysconsulting.net,
saskue@haysconsulting.net; GA32@ecfcbis.com
- **Laura A. Grifka** lgrifka@mtglaw.com, ecfnotifications@mtglaw.com
- **Office of the United States Trustee** ustpregion21.at.ecf@usdoj.gov

Dated: May 1, 2023

ROUNTREE LEITMAN KLEIN & GEER, LLC

/s/Will Geer
Will Geer, GA Bar No. 940493
2987 Clairmont Road, Suite 350
Atlanta, GA 30329
wgeer@rlkglaw.com
Tel. 404-584-1238

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

| | | |
|---------------------------------|---|--------------------------|
| IN RE: |) | CHAPTER 7 |
| |) | |
| BAM TECH SOLUTIONS, INC. |) | |
| |) | CASE NO: 23-53167 |
| |) | |
| Debtor. |) | |
| |) | |

**ORDER GRANTING DEBTOR'S SECOND MOTION FOR EXTENSION OF TIME
FOR FILING SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

This matter is before the Court upon Debtor's Second Motion for Extension of Time for Filing Schedules and Statement of Financial Affairs (the "Motion") [Docket No.] filed on May 1, 2023. It appears to the Court that a Chapter 7 case was commenced by the filing of a voluntary petition on April 3, 2023, constituting an Order for Relief; that pursuant to 11 U.S.C. § 521 and Federal Rule of Bankruptcy Procedure 1007(c), Debtor is obligated to file its Schedules and Statement of Financial Affairs within fourteen (14) days of the Order for Relief, and that the aforementioned deadline expired on April 17, 2023; and that Debtor previously obtained an extension of time in which to file its Schedules and Statement of Financial Affairs through and including May 1, 2023; and that the Debtor

seeks and additional extension of time in which to file its Schedules and Statement of Financial Affairs through and including May 5, 2023; that the Section 341 Meeting of Creditors has not passed and for good cause shown, it is hereby

ORDERED AND ADJUDGED as follows:

1. The Motion is **GRANTED**; and
2. The time period within which Debtor must file its schedules and Statement of Financial Affairs is hereby extended through and including May 5, 2023.

[END OF DOCUMENT]

Prepared and Presented by:

ROUNTREE LEITMAN KLEIN & GEER, LLC

/s/ Will Geer

Will Geer, GA Bar No. 940493
2987 Clairmont Road, Suite 350
Atlanta, GA 30329
Tel. 404-584-1238
wgeer@rlkglaw.com
Attorneys for Debtor

DISTRIBUTION LIST

Will Geer
Rountree Leitman Klein & Geer, LLC
2987 Clairmont Rd., Suite 350
Atlanta, GA 30329

S. Gregory Hays
Hays Financial Consulting, LLC
Suite 555
2964 Peachtree Road
Atlanta, GA 30305